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DEBT RESOLUTION DIRECT, LLC  
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10 **UNITED STATES BANKRUPTCY COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION**

12 In re:  
13 THE LITIGATION PRACTICE GROUP  
14 P.C.,  
15 Debtor,

16 RICHARD A. MARSHACK, Chapter 11  
17 Trustee, for The Bankruptcy Estate of  
Litigation Practice Group P.C. and  
Liquidating Trustee of the LPG  
Liquidation Trust,

18 Plaintiff,

19 v.

20 DEBT RESOLUTION DIRECT, LLC  
21 AND DAVID JOHN ILLNICKI,  
22 Defendants.

Case No.: 8:23-bk-10571-SC

Chapter 11

Adv. Proc. No.: 8:24-ap-01149

**JOINT STIPULATION TO  
EXTEND DEFENDANT DEBT  
RESOLUTION DIRECT, LLC'S  
TIME TO ANSWER PLAINTIFF'S  
COMPLAINT**

Complaint Served: November 22, 2024

Response Date (after multiple  
extensions): April 18, 2025

Proposed Response Date: May 19,  
2025

[NO HEARING REQUIRED]

23 **TO THE HONORABLE COURT:**

24 Plaintiff RICHARD A. MARSHACK, Chapter 11 Trustee, for The  
25 Bankruptcy Estate of The Litigation Practice Group P.C. and Liquidating Trustee of  
26 the LPG Liquidation Trust ("Plaintiff") and Defendant DEBT RESOLUTION  
27 DIRECT, LLC ("DRD") (collectively, the "Parties"), by and through their  
28

1 undersigned counsel of record, hereby agree to enter into the following Joint  
2 Stipulation to extend DRD's time to respond to the Complaint (the "Complaint"):

3 WHEREAS, Plaintiff filed the Complaint on November 22, 2024 and initiated  
4 the above-captioned adversary proceeding;

5 WHEREAS, pursuant to this Court's Summons and Notice of Status  
6 Conference in Adversary Proceeding [LBR 7004-1], DRD's initial responsive  
7 pleading deadline was December 23, 2024;

8 WHEREAS, the Parties' respective counsel met and conferred and stipulated  
9 to an initial extension of time of twenty-eight (28) days, until January 20, 2025, for  
10 DRD to respond to the Complaint;

11 WHEREAS, the Parties' respective counsel met and conferred and stipulated  
12 further to a second extension of time of twenty-eight (28) days, until February 17,  
13 2025, for DRD to respond to the Complaint;

14 WHEREAS, the Parties' respective counsel met and conferred and stipulated  
15 further to a third extension of time of thirty (30) days, until March 19, 2025, for DRD  
16 to respond to the Complaint;

17 WHEREAS, the Parties' respective counsel met and conferred and stipulated  
18 further to a fourth extension of time of thirty (30) days, until April 18, 2025, for DRD  
19 to respond to the Complaint;

20 WHEREAS, although the Parties agreed that the fourth extension would be the  
21 final extension, Plaintiff filed a second Complaint (the "Second Complaint") with one  
22 cause of action for aiding and abetting a fraudulent transfers on March 17, 2025,  
23 against Matthew Clegg, Richard Senitte, and David Nearing, who were principals of  
24 MRD Marketing LLC ("MRD"), and, in the case of Senitte and Clegg, also principals  
25 of DRD;

26 WHEREAS, due to the intervening event of Plaintiff filing the Second  
27 Complaint, the Parties met and conferred and stipulated further to a fifth extension of

1 time of thirty-one (31) days (Federal Rule of Bankruptcy Procedure Rule 9006(c)  
2 mandates that if the last day of a deadline falls on a Sunday, which is the case here,  
3 the period continues to run until the end of the next day), until May 19, 2025, for DRD  
4 to respond to the Complaint;

5 WHEREAS, this extension is not requested for any improper purpose and will  
6 not cause any party to suffer prejudice;

7 **THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and  
8 through the Parties' respective undersigned counsel, that DRD's deadline to move to  
9 dismiss, answer or otherwise respond to Plaintiff's Complaint shall be extended to  
10 and including May 19, 2025;

11 **IT IS SO STIPULATED.**

13 Dated: April 18, 2025

DINSMORE & SHOHL LLP

14 By: /s/ Sarah Mattingly  
15 Sarah Mattingly  
16 Attorney for Plaintiff  
Richard A. Marshack

17 Dated: April 18, 2025

COZEN O'CONNOR

18 By: /s/ Matthew S. Steinberg  
19 Matthew S. Steinberg  
20 Brian L. Shaw  
21 Brandon Posivak  
22 Attorneys for Defendant  
23 DEBT RESOLUTION DIRECT, LLC

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25 All signatories listed, and on whose behalf the filing is submitted, concur in  
26 the filing's content and have authorized the filing.

27 Dated: April 18, 2025

28 By: /s/ Matthew S. Steinberg  
29 Matthew S. Steinberg